UNITED STATES DISTRICT COURT (4) C) DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-39046-KPN

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ALICE W. HALPIN.

Plaintiff

٧.

RDC OF CONNECTICUT, INC., R.D. CLARK AND SONS, INC., KATELAND LEASING, INC., PINNACLE TRANSPORTATION, INC. and CHINA GROVE TRANSPORT, INC.

Defendants

PLAINTIFF'S SETTLEMENT PROPOSAL

A Demand for settlement is hereby in the amount of Four Hundred Thousand and 00/100 (\$400,000.00) dollars.

Respectfully submitted,

The Plaintiff,

Alice W. Halpin, By her Attorney.

ROBERT S. MURPHY, JR., ESQ.

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May 11, 2005

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CERTIFICATE OF SERVICE

I, ADAM J. BASCH, hereby certify that on May 11, 2005, I caused a copy of the foregoing to be served upon all interested parties by mailing a copy thereof, postage prepaid, first class mail to:

Michael E. MacDonald Diane Degiacomo Cane, Hibbard, Mayers & Cook, P.C. 66 West Street Pittsfield, MA 01201

ADAM J. BASCH

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